

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JANICE M. LAWRENCE,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 03-12610-WGY
	)	
AVAYA INC.,	)	
	)	
	)	
Defendant.	)	
	)	

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

Pursuant to Fed R. Civ. P. 16, Local Rule 16.1 and this Court's Notice of Scheduling Conference dated April 16, 2004, Plaintiff Janice M. Lawrence ("Plaintiff") and Defendant Avaya Inc. ("Defendant") submit this Joint Statement. Counsel for the parties have conferred concerning all matters herein, and have agreed in full upon this Joint Statement.

**I. Discovery and Motions Schedule**

The parties propose the following discovery and motions schedule:

- A. Fed. R. Civ. P. 26(a)(1) initial disclosures by June 3, 2004 (1 month following the initial scheduling conference)
- B. Completion of discovery by November 3, 2004 (6 months following the initial scheduling conference);
- C. Motions pursuant to Fed. R. Civ. P. 56 filed by December 3, 2004 (1 month following the completion of discovery); and
- D. Pretrial conference within two months following the Court's resolution of any motions pursuant to Fed. R. Civ. P. 56.

**II. Trial Before Magistrate Judge**

Neither party consents at this time to a trial of this action before a Magistrate Judge.

**III. Local Rule 16.1(D)(3) Certifications**

The parties' Local Rule 16.1(D)(3) Certifications will be filed separately.

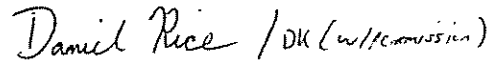
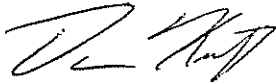
Respectfully submitted,

AVAYA INC.,

JANICE M. LAWRENCE,

By its attorneys,

By her attorney,

 /DK (w/permission)

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Dated: April 28, 2004